FILED

APR 22 2015

## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

2 9 2013
U. S. DISTRICT COURT EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,	)
Plaintiff,	)
v.	)
DAVID B. ARNOLD, a/k/a "P,"	4:15CR180 CEJ/JMB
a/k/a "Daddy,"	)
Defendant.	)

## INDICTMENT

## **COUNT I**

The Grand Jury charges that:

Between on or about April 6, 2015 and April 9, 2015, within the Eastern District of Missouri and elsewhere, the defendant,

#### DAVID B. ARNOLD, a/k/a "P," a/k/a "Daddy,"

did knowingly transport an individual, namely "Jane Doe A," who had not yet attained the age of 18 years in interstate commerce with the intent that such individual would engage in prostitution.

In violation of Title 18, United States Code, Section 2423(a).

## **COUNT II**

The Grand Jury further charges that:

Between on or about April 6, 2015 and April 9, 2015, within the Eastern District of Missouri and elsewhere, the defendant,

DAVID B. ARNOLD, a/k/a "P," a/k/a "Daddy,"

did knowingly, in or affecting interstate commerce: recruit, entice, harbor, transport, provide, obtain or maintain by any means a person, "Jane Doe A," knowing or in reckless disregard of the fact that such person had not attained the age of 18 years; knowing such person would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Section 1591(a)(1) and punishable under Title 18, United States Code, Section 1594(a).

## **COUNT III**

The Grand Jury further charges that:

Between on or about April 6, 2015 and April 9, 2015, within the Eastern District of Missouri and elsewhere, the defendant,

# DAVID B. ARNOLD, a/k/a "P," a/k/a "Daddy,"

did knowingly use facilities in interstate commerce with the intent to promote, manage, establish, or carry on an unlawful activity, to wit: prostitution, and thereafter did knowingly promote, manage, establish or carry on that unlawful activity.

In violation of Title 18, United States Code, Section 1952(a)(3).

	A TRUE BILL.	
	FOREPERSON	-
RICHARD G. CALLAHAN United States Attorney		

JENNIFER A. WINFIELD, #53350MO Assistant United States Attorney